

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ELIZABETH DE COSTER, *et al.*, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware
corporation,

Defendant.

Case No. 2:21-cv-00693-RSM

DEBORAH FRAME-WILSON, *et al.*, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware
corporation,

Defendant.

Case No. 2:20-cv-00424-RSM

**STIPULATED MOTION AND ORDER
RELATING TO DATA STORAGE**

**NOTE ON MOTION CALENDAR:
July 18, 2023**

STIPULATED MOTION RE DATA STORAGE
Case Nos. 2:21-cv-00693 and 2:21-cv-00694

property name.

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1 The parties, by and through their counsel, stipulate and agree as follows.

2 1. The parties have met and conferred about the logistics regarding the transfer of
3 large electronic files with respect to Amazon's forthcoming data production.

4 2. The parties contemplate that Plaintiffs will store data produced in these matters in
5 an Amazon Web Services ("AWS") S3 storage space.

6 3. Plaintiffs' experts contemplate performing analyses on such data within that
7 storage space.

8 IT IS HEREBY STIPULATED AND AGREED, and the Parties ask the Court to order,
9 that:

10 a. Amazon personnel with responsibility for this litigation shall not access or view
11 that AWS S3 storage space, except to upload data to it, nor will they monitor Plaintiffs' storage
12 space to obtain information about how Plaintiffs are putting data to use for purposes of litigation
13 analyses;

14 b. If, despite their forbearance, Amazon personnel with responsibility for this
15 litigation nonetheless obtain such information, Amazon's counsel shall promptly notify
16 Plaintiffs' counsel; and

17 c. The data will otherwise be subject to Amazon's standard data and privacy
18 protections and procedures.

19 DATED this 18th day of July, 2023

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18 *Attorneys for Defendant Amazon.com, Inc.*

ORDER

Pursuant to stipulation, IT IS SO ORDERED.

DATED this 19th day of July, 2023.



RICARDO S. MARTINEZ
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on July 18, 2023, a true and correct copy of the foregoing was filed electronically by CM/ECF, which caused notice to be sent to all counsel of record.

/s/ Steve W. Berman

Steve W. Berman